

DMB:MSA
F.# 2009R00384

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

LARON SPICER,
also known as "Face,"

[REDACTED]

SHAHEIM ROGERS,
also known as "Mouse,"

[REDACTED]

JAMES WILLIAMS,
also known as "Sleeps" and
"Michael Motes,"

JERMAINE WILLIAMS,
also known as "Main,"

DARRIS BROWN,
also known as "Moneybags,"

DWAYNE MONROE,
also known as "Big D,"

RASHAWN SHARP,
also known as "Poppy," and

MICHAEL WEBB,
also known as "Cash,"

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

INTRODUCTION TO ALL COUNTS

At all times relevant to this Indictment, unless
otherwise indicated:

Cr. No. _____
(T. 18, U.S.C.,
§§ 922(d)(1),
924(c)(1)(A)(ii),
924(c)(1)(A)(iii),
924(j)(1), 1951(a),
1959(a)(1), 1962(c),
1962(d), 1963, 2 and 3551
et seq.; T. 21, U.S.C.,
§§ 841(a)(1),
841(b)(1)(A)(i),
841(b)(1)(A)(iii),
841(b)(1)(B)(iii),
841(b)(1)(C), 846 and
848(e)(1)(A))

The Enterprise

1. The Spicer Enterprise, also known as "the Nine-Tray Gangsters" and "the Bugout Boys" (and referred to herein as "the enterprise" or the "Spicer Enterprise") was a gang that operated principally in the neighborhood of Sterling Place, between Rochester and Buffalo Avenues, in Brooklyn, New York. Members and associates of the enterprise have engaged in narcotics trafficking and acts of violence, including murder, attempted murder, robbery and assault.

2. The defendant LARON SPICER, also known as "Face, was an associate or member of the Spicer Enterprise.

■ [REDACTED]

[REDACTED]

[REDACTED]

6. The defendant SHAHEIM ROGERS, also known as "Mouse," was an associate or member of the Spicer Enterprise.

■ [REDACTED]

[REDACTED]

8. The defendant JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," was an associate or member of the Spicer Enterprise.

9. The defendant JERMAINE WILLIAMS, also known as "Main," was an associate or member of the Spicer Enterprise.

10. The Spicer Enterprise, including its leadership, members and associates, constituted an "enterprise" as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The Spicer Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

11. The purposes of the enterprise included the following:

a. Enriching the members and associates of the enterprise through criminal activity, including robbery and narcotics trafficking.

b. Promoting and enhancing the prestige, reputation and position of the enterprise with respect to rival criminal organizations.

c. Preserving and protecting the power, territory and criminal ventures of the enterprise through the use

of intimidation, threats of violence and acts of violence, including assault and murder.

d. Keeping victims and rivals in fear of the enterprise and its members and associates.

Means and Methods of the Enterprise

12. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Members of the enterprise and their associates used, attempted to use and conspired to use narcotics trafficking and robbery as means of obtaining money.

b. Members of the enterprise and their associates committed, attempted to commit and threatened to commit acts of violence, including murder, attempted murder, robbery and assault, to enhance the enterprise's prestige and protect and expand the enterprise's criminal operations.

c. Members of the enterprise and their associates used and threatened to use physical violence against various individuals, including members of rival criminal organizations.

COUNT ONE
(Racketeering)

13. The allegations contained in paragraphs one through twelve are realleged and incorporated as if fully set forth in this paragraph.

14. On or about and between January 1, 1998 and August 23, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LARON SPICER, also known as "Face," [REDACTED]

[REDACTED]
[REDACTED] SHAHEIM

ROGERS, also known as "Mouse," [REDACTED]

[REDACTED] JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," and JERMAINE WILLIAMS, also known as "Main," together with others, being persons employed by and associated with the Spicer Enterprise, an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conducted and participated, directly and indirectly, in the conduct of the affairs of the Spicer Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of the racketeering acts set forth below.

RACKETEERING ACT ONE

(Conspiracy to Distribute Cocaine Base and Heroin)

15. On or about and between January 1, 1998 and August 2, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LARON SPICER, also known as "Face," [REDACTED]

[REDACTED]

[REDACTED] SHAHEIM

ROGERS, also known as "Mouse," [REDACTED]

[REDACTED] JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," and JERMAINE WILLIAMS, also known as "Main," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) 50 grams or more of a substance containing cocaine base, a Schedule II controlled substance, and (b) one kilogram or more of a substance containing heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 846.

RACKETEERING ACT TWO

(Distribution of Cocaine Base)

16. On or about January 29, 1998, within the Eastern District of New York, the defendant SHAHEIM ROGERS, also known as "Mouse," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine

base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT THREE

(Possession of Cocaine Base With Intent to Distribute))

17. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING ACT FOUR

(Possession of Cocaine Base With Intent to Distribute)

18. On or about April 2, 2002, within the Eastern District of New York and elsewhere, the defendants [REDACTED] [REDACTED] and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT FIVE
(Distribution of Cocaine Base)

19. On or about August 16, 2002, within the Eastern District of New York, the defendants SHAHEIM ROGERS, also known as "Mouse," and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT SIX
(Distribution of Cocaine Base)

20. On or about August 20, 2002, within the Eastern District of New York, the defendants [REDACTED] [REDACTED] SHAHEIM ROGERS, also known as "Mouse," and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT SEVEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING ACT EIGHT
(Robbery)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING ACT NINE
(Robbery Conspiracy and Attempted Robbery)

23. The defendants LARON SPICER, also known as "Face,"
[REDACTED] and JAMES WILLIAMS, also
known as "Sleeps" and "Michael Motes," together with others,

committed the following acts, either one of which alone constitutes Racketeering Act Nine:

A. Conspiracy to Commit Robbery

24. On or about July 17, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," [REDACTED] and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by the robbery of narcotics and narcotics proceeds from individuals whose identities are known to the grand jury, contrary to Title 18, United States Code, Section 1951(a).

B. Attempted Robbery

25. On or about July 17, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," [REDACTED] and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally attempt to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by the robbery of narcotics and narcotics proceeds from individuals whose identities are known to the grand jury, contrary to Title 18, United States Code, Sections 1951(a) and 2.

RACKETEERING ACT TEN
(Murder of William Singleterry)

26. On or about July 17, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," and [REDACTED] together with others, with intent to cause the death of another person, to wit: William Singleterry, caused his death, contrary to New York Penal Law Sections 125.25(1) and 20.00.

RACKETEERING ACT ELEVEN
(Distribution of Cocaine Base)

27. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING ACT TWELVE
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING ACT THIRTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING FOURTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING ACT FIFTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING ACT SIXTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RACKETEERING ACT SEVENTEEN
(Distribution of Cocaine Base)

33. On or about June 24, 2010, within the Eastern District of New York, the defendant JERMAINE WILLIAMS, also known as "Main," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled

substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT EIGHTEEN
(Distribution of Cocaine Base)

34. On or about July 1, 2010, within the Eastern District of New York, the defendant JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

RACKETEERING ACT NINETEEN
(Distribution of Cocaine Base)

[REDACTED]

(Title 18, United States Code, Sections 1962(c), 1963 and 3551 et seq.)

COUNT TWO
(Racketeering Conspiracy)

36. The allegations contained in paragraphs one through twelve are realleged and incorporated as if fully set forth in this paragraph.

37. On or about and between January 1, 1998 and August 23, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LARON SPICER, also known as "Face," [REDACTED]

[REDACTED]
[REDACTED] SHAHEIM

ROGERS, also known as "Mouse," [REDACTED]
[REDACTED] JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," and JERMAINE WILLIAMS, also known as "Main," together with others, being persons employed by and associated with the Spicer Enterprise, an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conspire to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5).

38. The pattern of racketeering activity through which the defendants LARON SPICER, also known as "Face," [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] SHAHEIM ROGERS, also known as "Mouse," [REDACTED]

[REDACTED] JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," and JERMAINE WILLIAMS, also known as "Main," agreed to conduct the affairs of the enterprise consisted of the racketeering acts set forth in paragraphs fifteen through thirty-five of Count One of this Indictment, as Racketeering Acts One through Nineteen, which are realleged and incorporated as if fully set forth in this paragraph. Each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

(Title 18, United States Code, Sections 1962(d), 1963 and 3551 et seq.)

COUNT THREE

(Conspiracy to Distribute Cocaine Base and Heroin)

39. On or about and between January 1, 1998 and August 2, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LARON SPICER, also known as "Face," [REDACTED]

[REDACTED] DARRIS BROWN, also known as "Moneybags," [REDACTED] DWAYNE MONROE, also known as "Big D," [REDACTED]

[REDACTED] SHAHEIM ROGERS, also known as "Mouse," [REDACTED]

[REDACTED] RASHAWN SHARP, also known as "Poppy,"

MICHAEL WEBB, also known as "Cash," JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," and JERMAINE WILLIAMS, also known as "Main," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) 50 grams or more of a substance containing cocaine base, a Schedule II controlled substance, and (b) one kilogram or more of a substance containing heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(i) and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT FOUR
(Unlawful Use of a Firearm)

40. On or about and between January 1, 1998 and August 2, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LARON, SPICER, also known as "Face," [REDACTED]

[REDACTED]
[REDACTED] DWAYNE MONROE, also known as "Big D," [REDACTED]
[REDACTED] SHAHEIM ROGERS, also known as "Mouse," [REDACTED] RASHAWN SHARP, also known as "Poppy," and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," did knowingly and intentionally use and carry a firearm during and in relation to a drug trafficking

crime, to wit: the crime charged in Count Three, and did knowingly and intentionally possess a firearm in furtherance of said crimes of violence and drug trafficking crimes, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT FIVE
(Robbery Conspiracy)

41. On or about July 17, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," [REDACTED] and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by the robbery of narcotics and narcotics proceeds from individuals whose identities are known to the grand jury.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT SIX
(Attempted Robbery)

42. On or about July 17, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," [REDACTED] and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together

with others, did knowingly and intentionally attempt to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by the robbery of narcotics and narcotics proceeds from individuals whose identities are known to the grand jury.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT SEVEN
(Unlawful Use of a Firearm)

43. On or about July 17, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," [REDACTED] and JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally use and carry a firearm during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts Five and Six, and did knowingly and intentionally possess a firearm in furtherance of such crimes of violence, which firearm was brandished.

(Title 18, United States Code, Sections 924(c) (1) (A) (ii), 2 and 3551 et seq.)

COUNT EIGHT
(Murder In-Aid-Of Racketeering)

44. At all times relevant to this Indictment, the Spicer Enterprise, as more fully described in paragraphs one through twelve, which are realleged and incorporated as if fully

set forth in this paragraph, including its leadership, members and associates, constituted an "enterprise" as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

45. At all times relevant to this Indictment, the Spicer Enterprise, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is: acts involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841, 846, and 848(e)(1); acts involving murder, in violation of New York Penal Law sections 125.25(1) and 20; and acts involving robbery, in violation of New York Penal law section 160.15 and Title 18, United States Code, Section 1951(a).

46. On or about July 18, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," and [REDACTED] together with others, as consideration for the receipt of something of pecuniary value and for the purpose of maintaining and increasing position in the Spicer Enterprise, an enterprise that was engaged in racketeering activity, with intent to cause the death of

another person, to wit: William Singleterry, did cause his death contrary to New York Penal Law Sections 125.25(1) and 20.00.

(Title 18, United States Code, Sections 1959(a)(1), 2 and 3551 et seq.)

COUNT NINE

(Murder of William Singleterry)

47. On or about July 18, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," and [REDACTED] together with others, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21 of the United States Code, to wit: the crime charged in Count Three, did knowingly and intentionally kill, counsel, command, induce, procure and cause the intentional killing of another person, to wit: William Singleterry, and such killing did result.

(Title 21, United States Code, Section 848(e)(1)(A); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TEN

(Unlawful Use of a Firearm)

48. On or about July 18, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," and [REDACTED] together with others, did knowingly and intentionally use and carry a firearm during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts Eight and Nine, and did

knowingly and intentionally possess a firearm in furtherance of such crimes of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT ELEVEN

(Causing Death Through Use of a Firearm)

49. On or about July 18, 2008, within the Eastern District of New York, the defendants LARON SPICER, also known as "Face," and [REDACTED] together with others, in the course of a violation of Title 18, United States Code, Section 924(c), to wit: the crime charged in Count Ten, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing is a murder as defined by Title 18, United States Code, Section 1111(a), in that the defendants, with malice aforethought, did unlawfully kill William Singleterry willfully, deliberately, maliciously and with premeditation.

(Title 18, United States Code, Sections 924(j)(1), 2 and 3551 et seq.)

COUNT TWELVE

(Sale of a Firearm to a Felon)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT THIRTEEN
(Distribution of Cocaine Base)

51. On or about March 4, 2010, within the Eastern District of New York, the defendant DARRIS BROWN, also known as "Moneybags," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551, et seq.)

COUNT FOURTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT FIFTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT SIXTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT SEVENTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT EIGHTEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT NINETEEN
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT TWENTY
(Distribution of Cocaine Base)

58. On or about June 24, 2010, within the Eastern District of New York, the defendant JERMAINE WILLIAMS, also known as "Main," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled

substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY-ONE
(Distribution of Cocaine Base)

59. On or about July 1, 2010, within the Eastern District of New York, the defendant JAMES WILLIAMS, also known as "Sleeps" and "Michael Motes," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY-TWO
(Distribution of Cocaine Base)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

COUNT TWENTY-THREE
(Distribution of Cocaine Base)

61. On or about July 7, 2010, within the Eastern District of New York, the defendant DARRIS BROWN, also known as "Moneybags," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

A TRUE BILL

FOREPERSON

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK